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May 12, 2017

By Electronic Mail and First Class Mail

Ms. Sheri L. Bianchin
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U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Supplemental Environmental Project Completion Report**

Dear Ms. Bianchin:

On behalf of the NL Industries/Taracorp Superfund Site Group (Group), enclosed are three CDs, each containing the Supplemental Environmental Project (SEP) Completion Report for the NL Industries/Taracorp Superfund Site in Granite City, Illinois. The Group prepared the SEP Completion Report in consultation with the Madison County Community Development (MCCD) and is submitting the report pursuant to the Consent Decree.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed
Project Coordinator

enclosures

cc: Ms. Peggy Dugger – Madison County Community Development
(with enclosure, by electronic mail and CD by first class mail)
Ms. Erin Rednour - Illinois EPA
(with enclosure, by electronic mail and first class mail)
Mr. Tom Miller – Illinois EPA
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Technical Committee, NL Industries/Taracorp Superfund Site Group
(with enclosure, electronic mail)

**NL INDUSTRIES/TARACORP SUPERFUND SITE
GRANITE CITY, ILLINOIS**

SEP COMPLETION REPORT



Prepared for:
**U.S. Environmental Protection Agency
Region 5
Chicago, Illinois**

Prepared by:
**NL Industries/Taracorp Superfund Site Group
In consultation with
Madison County Community Development**

May 2017

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SECTION 1.0 INTRODUCTION

Pursuant to Section XVIII of the Consent Decree, Civil No. 91-00578-JLF, the NL Industries/Taracorp Superfund Site Group (Group) contracted with the Madison County Community Development (MCCD) to complete a supplemental environmental project (SEP) to abate potential hazards from lead-based paint on residential properties located within the boundaries of the NL Industries/Taracorp Superfund Site (site) in Granite City, Madison, and Venice, Illinois. Following the U.S. Environmental Protection Agency's (EPA) approval of the SEP Work Plan and with approved extensions from EPA, the SEP was performed at the site from 2004 to 2017.

The Group prepared this SEP Completion Report, in consultation with the Madison County Community Development (MCCD), to document the SEP work performed at the site. More specifically, this report documents the Group's funding of MCCD's work to assess potential risks due to lead paint at housing units within the boundaries of the site, abate the potential lead-paint hazards, and satisfy the requirements of the Consent Decree. MCCD's Final Report, Lead-Based Paint Hazard Control, is included in Appendix 1.

This SEP Completion Report is organized in the following manner:

- **Section 1.0 – Introduction:** Provides introductory information about the SEP and the purpose and organization of this SEP Completion Report.
- **Section 2.0 – Site Location and History:** Provides background information about the location and history of the site.
- **Section 3.0 – SEP Activities:** Provides a summary of SEP requirements and a summary of the tasks performed by MCCD and the Group to implement the SEP.
- **Section 4.0 – SEP Property List:** Provides a list of properties where MCCD performed lead paint risk assessments, lead paint abatement and clearance activities, and provides MCCD's risk assessment and clearance reports for each property.
- **Section 5.0 – Additional Soil Sampling and Remediation at SEP Properties:** Provides a summary of MCCD's soil sampling data and follow-up actions taken by the Group, with EPA's approval, to address the soil sampling data at certain SEP properties.
- **Section 6.0 – Chronology:** Provides a chronological listing of the key tasks associated with the implementation of the SEP.
- **Section 7.0 – SEP Costs:** Provides a summary of the Group's costs to implement the SEP.
- **Section 8.0 – Summary and Certification:** Provides a summary of the environmental and public health benefits attributable to the SEP and the Group's certification pursuant to the Consent Decree.

The objective of the SEP, as indicated in the Consent Decree, was to achieve a risk reduction at no less than 50 high-priority homes within the boundaries of the site, unless insufficient funds remained to accomplish that objective. As discussed in additional detail in this SEP Completion Report, the Group and MCCD completed lead paint abatement and clearance work at 127 properties within the boundaries of the site.

SECTION 2.0 SITE LOCATION AND HISTORY

2.1 Site Location

The NL Industries/Taracorp Superfund Site (site) is located in a heavily industrialized section of Granite City, Illinois, a community of approximately 40,000 people located approximately two miles east of St. Louis, Missouri (Figure 1). Secondary lead reclamation operations were conducted at the main industrial site, located at 16th Street and Cleveland Boulevard in Granite City, from 1903 until 1983 (Figure 2). As shown on Figure 1, the site also includes areas within the cities of Madison and Venice, Illinois.

2.2 Site History

Secondary lead reclamation operations, as indicated above, were performed at the main industrial site from 1903 until 1983. Lead-acid battery recycling operations were performed in conjunction with secondary smelting activities from the 1950s until 1983. In June 1981, St. Louis Lead Recyclers, Inc. (SLLR) began to separate various components of an on-site waste pile in order to recycle lead-containing materials, hard rubber battery cases, and plastic battery cases. SLLR operations ceased in June 1983.

In December 1982, EPA proposed to include the site on the National Priorities List. In May 1985, a former owner and operator of the site, NL Industries, voluntarily entered into an Agreement and Administrative Order by Consent with EPA and the Illinois Environmental Protection Agency (IEPA) to perform a remedial investigation and feasibility study (RI/FS) of the site. After the site was added to the NPL in 1986, NL Industries initiated the remedial investigation in January 1987. EPA selected the remedy for the site and issued a Record of Decision (ROD) in March 1990 and a Unilateral Administrative Order (UAO) in November 1990. After EPA rejected an offer from a group of potentially responsible parties (PRPs) to perform a portion of the required work, EPA initiated remedial activities at the site. In September 1995, EPA issued a Decision Document/Explanation of Significant Differences (DD/ESD) to modify certain components of the remedial action. For the remote fill properties (e.g., properties on which hard rubber battery case materials and lead concentrations above 500 mg/kg were present in soil), EPA revised the remedy in the 1995 DD/ESD and selected a remediation technique which involved excavation to a maximum depth of three feet below the surface, backfilling the excavated areas, and restoring the excavated and backfilled areas.

In conjunction with EPA's remedial design and remedial activities during the 1990s, EPA retained Woodward-Clyde Consultants to conduct a site investigation and to issue a report providing the results from soil sampling activities on the main industrial site. Subsequently, EPA authorized the Army Corps of Engineers to:

- Complete the remedial design and remove lead-impacted soil and battery case chips in the adjacent residential areas and remote fill areas in Granite City, Venice, and Madison.
- Complete the remedial design for the Taracorp pile and main industrial site.

In October 1992, Woodward-Clyde Consultants issued a final report to EPA to provide the results of soil sampling activities within the residential areas. The Army Corps of Engineers subsequently tasked OHM Remediation Services Corp. (OHM) to remove lead-impacted soil and hard rubber battery case chips at various locations associated with the site in Granite City, Venice, and Madison. From 1993 to 1998, OHM remediated 738 properties on behalf of EPA.

In 1994, and as a result of the ongoing litigation with the PRPs,¹ EPA reopened the ROD and accepted public comments. In September 1995 and as indicated above, EPA reaffirmed the remedial action plan with several modifications and added a groundwater containment component in a DD/ESD.

Beginning in June 1998, a group of EPA-identified potentially responsible parties, collectively known as the NL Industries/Taracorp Superfund Site Group (Group), began to perform remedial activities, with oversight provided by EPA and the Army Corps of Engineers, for the remaining residential lots and remote fill areas. By 2001, the Group had performed remedial activities at 802 residential properties and 21 alleys not previously completed by EPA. The Group also completed remedial activities at the main industrial site which involved:

- Consolidation of all on-site hazardous materials into the existing Taracorp pile.
- Construction of a new cell in the existing Taracorp pile with an engineered RCRA-grade liner and a leachate collection system.
- Construction of an engineered RCRA-grade cap over the entire Taracorp pile.
- Construction of storm water and erosion controls on and around the capped pile.
- Restoration of the site.

In October 2003, the Group received a letter from EPA in which EPA certified, pursuant to Section 48(b) of the Consent Decree, that the Group had completed the remedial action for the site. Since the time that remedial activities were completed, the Group has conducted post-remediation operation and maintenance activities at the site pursuant to an Operation and Maintenance Plan approved by EPA.

Pursuant to Paragraph 123 of the Consent Decree, in March 2006, EPA disbursed \$1,847,169 to the Group, which represented the entirety of the proceeds from EPA's settlements with de minimis parties. The purpose of the disbursement was to assist the Group in carrying out its responsibilities under the Consent Decree.

By letter dated May 15, 2006, EPA requested the Group's assistance in implementing institutional controls for the industrial site (i.e., the Taracorp pile and adjacent industrial properties), and for "properties that are not part of the source areas (i.e., Taracorp property) such as the residential areas, roads and alleys." Following discussions with EPA, the Group submitted an Institutional Controls Work Plan to EPA. For the residential areas, the Institutional Controls Work Plan included the Group's plans for:

- Seeking access to 84 residential properties where the Group and EPA were previously unable to obtain access from the property owners during remedial activities.

¹ Per the Responsiveness Summary, Attachment 2 of EPA's Decision Document/Explanation of Significant Differences (DD/ESD) dated 9/29/95, page 23, "[o]n July 31, 1991, the United States commenced the *United States, v. NL Industries, Inc., et al*, litigation, asserting claims against several PRPs: (1) to compel full compliance with U.S. EPA's Order; (2) for imposition of penalties and punitive damages for those PRPs' failure to comply with EPA's Order and (3) to recover the response costs incurred and to be incurred by the United States at the site. At the suggestion of the Defendants, EPA agreed to reopen the administrative record to reevaluate the appropriate cleanup standard for lead in residential soils. Pursuant to that agreement, EPA held a public comment period from October 14, 1994 to January 13, 1995, to allow interested parties to comment on the selected residential soil cleanup level for lead at the site."

- Seeking access to 10 other residential properties (including nine properties where the Madison County Community Development (MCCD) had performed lead-paint abatement activities as part of the SEP and one residential property where the owner requested soil sampling).
- Performing soil sampling for the 94 properties, if the Group was able to receive access from the property owners.
- Performing soil remediation for those among the 94 residential properties with lead concentrations in soil which exceeded 500 mg/kg.

Based upon EPA's approval, the Group initiated efforts in October 2010 to seek access from the owners of the 94 residential properties listed above. One additional property owner requested soil sampling while the work was being performed. Upon receipt of access agreements, the Group collected soil samples at 77 residential properties during the period from 2011 to 2016 and reported the data to EPA. Based upon the soil sampling data, the Group identified 16 properties (including 7 SEP properties) in consultation with EPA where the lead concentrations in soil exceeded 500 mg/kg only in the drip zone soil around the houses (with EPA's approval, the Group referred those property owners to MCCD for potential participation in the SEP). The Group performed remedial activities at 33 residential properties (including 4 SEP properties) in 2015-2016. The final inspection of the properties remediated in 2016 was performed in May 2017.

3.1 Summary of SEP Requirements

As indicated in Section 2.2, EPA reopened the ROD in 1994 as a result of ongoing litigation with a group of PRPs and accepted public comments on the ROD. The SEP, which was undertaken in connection with the settlement of the enforcement action taken by EPA, involved the completion of a lead paint abatement program that was designed to obtain significant environmental or public health protection and improvements.

The Group finalized a contract with MCCD in November 2005 to perform the lead paint abatement program for residential properties within the boundaries of the site. Pursuant to the Consent Decree, the contract obligated MCCD to prepare a SEP Work Plan that included protocols and an itemized budget for:

- Assessing potential risks due to lead paint at houses located within the boundaries of the site.
- Controlling and abating potential risks at high-priority homes.
- Achieving a reduction in potential risks at no less than 50 high-priority homes unless insufficient funds remained to accomplish that objective.

The Group's contract with MCCD authorized MCCD to spend up to \$2,000,000 to implement the SEP. The Consent Decree indicated that the funds provided by the Group were to be used by MCCD for purchasing equipment, hiring personnel, and otherwise conducting activities necessary to implement and complete the work described in the SEP Work Plan.

The Group submitted MCCD's monthly progress reports to EPA from November 2005 to December 2012 and MCCD's quarterly progress reports to EPA from January-March 2013 to January-March 2017 to document the SEP work that was performed. MCCD's final quarterly progress report is provided in Appendix 1. The Group prepared this SEP Completion Report, in consultation with MCCD, to further document the work performed as part of the SEP and to satisfy the requirements of the Consent Decree.

3.2 SEP Work Plan

In April 2003, the Group's counsel sent a letter to EPA to confirm that the Group was working with MCCD in regard to the SEP. In the letter, the Group's counsel also requested clarification from EPA regarding several SEP implementation issues, including the schedule for submission of the draft SEP Work Plan to EPA. Following receipt of information from EPA, MCCD completed a draft SEP Work Plan which was submitted to EPA in August 2003. The Group and MCCD received comments from EPA on the draft SEP Work Plan in December 2003. Following additional communications among the Group, EPA, and MCCD, and exchange of drawings showing the boundaries of the residential areas at the site, MCCD prepared a revised draft SEP Work Plan, which was submitted to EPA in June 2004. Following a conference call with EPA on August 16, 2004, the Group received a letter from EPA on August 16, 2004 and a revised letter from EPA on September 1, 2004 which approved the draft SEP Work Plan with modifications. MCCD submitted a revised version of the approved SEP Work Plan to EPA on August 31, 2004 to address EPA's modifications.

As the SEP was implemented, the SEP Work Plan was resubmitted to EPA on several occasions, as follows:

- **January 2007**

The August 2004 version of the SEP Work Plan was resubmitted to EPA.

- **February 2008**

The Group submitted a revised version of the SEP Work Plan to EPA that was prepared in consultation with MCCD to address EPA's comments.

- **May 2010**

Following discussions with MCCD and EPA, the Group submitted an updated SEP Work Plan to EPA to provide general updates and to reflect that SEP soil activities for some properties had been relocated into the revised version of the Institutional Controls Work Plan that the Group submitted to EPA on March 30, 2010.

- **November 2011**

In consultation with MCCD, the Group submitted draft Addendum 1 to the SEP Work Plan to EPA to provide the protocol for soil sampling within the drip zones of homes being addressed as part of the SEP. The protocol in the addendum was written for consistency with the protocol the Group was using for soil sampling within the drip zones of denied access residential properties.

As indicated above, EPA issued a letter to the Group on August 16, 2004 and a revised letter to the Group on September 1, 2004 (the letter is dated August 16, 2004, as revised) to approve the SEP Work Plan with modifications. EPA also issued letters to the Group on March 23, 2011 to approve Section 8.0 and Section 9.0 of the Institutional Controls Work Plan pertaining to the revised SEP Work Plan submitted to EPA on May 7, 2010 and the soil sampling and remediation protocol for certain SEP properties. Copies of EPA's letters are provided in Appendix 2.

3.3 Kick-Off Meeting and Public Outreach

On May 8, 2000, EPA issued a press release to recognize the nearly completed residential soil remediation activities at the site. Two days later on May 10, 2000, EPA held a news media briefing at the site to publicly announce the completion of remedial activities. During EPA's news media briefing, MCCD's Administrator spoke about the availability of funds to complete the SEP. Copies of EPA's news release, agenda for the news media briefing, and several newspaper articles about the news media briefing and SEP, are provided in Appendix 3.

After EPA approved the SEP Work Plan, MCCD advised the Group in March 2005 that MCCD planned to hold the public kick-off event related to the implementation of the SEP on April 13, 2005 at City Hall in Granite City. By the end of March 2005, MCCD had received six applications from property owners for participation in the SEP. During the April 13, 2005 public kick-off meeting, MCCD again announced the availability of funds for lead-paint abatement activities at residential properties located within the boundaries of the site. MCCD distributed coloring books, pencils, growth charts, magnets, and rulers at the kick-off event to encourage public participation in the SEP and "Lead-Safe Madison County."

Because public participation in the kick-off meeting, and throughout the implementation of the SEP, was less than MCCD originally anticipated, MCCD continued to perform public outreach

and education activities while the SEP was being performed to encourage additional public participation. Some of the public outreach activities performed by MCCD included the following:

- Maintaining a close relationship and distributing information to community groups and the public school system in Granite City, Madison, and Venice.
- Participating in and distributing information during local health fairs and other community events.
- Preparing door hangars that were distributed by MCCD staff and MCCD's contactors to property owners with the boundaries of the site.
- Participating in realtor seminars.
- Participating in landlord association meetings.
- Promoting the SEP through Granite City's public access television channel.

Additional information regarding MCCD's education and outreach activities are provided in MCCD's Final Report, Lead-Based Paint Hazard Control (Appendix 1).

3.4 SEP Administration

The SEP Work Plan included MCCD's plans for managing and implementing the SEP. Specifically, the SEP Work Plan indicated that MCCD's Lead Hazard Control Program staff would administer all SEP program functions which were defined to include the activities listed on Table 1.

Table 1 MCCD's SEP Administration Tasks
Coordinating efforts with the Madison County Board's Grant Committee, Board Chairman, and other MCCD programs.
Reviewing and updating MCCD's specifications for lead paint-related work.
Soliciting technical and cost proposals from prospective consultants and contractors for lead paint risk assessments, abatement activities, and clearance activities.
Selecting risk assessors, licensed by the Illinois Board of Health, to perform lead paint risk assessments at housing units selected to participate in the SEP.
Selecting licensed lead contractors to perform lead paint abatement activities to make housing units safe from lead paint hazards.
Selecting licensed risk assessors to determine the effectiveness of lead paint abatement activities performed by lead contractors and to confirm that approved clearance levels were achieved.
Identifying and selecting eligible housing units for participation in the SEP, through an aggressive public outreach effort and by evaluating referrals from the Madison County Health Department, MCCD's Housing Rehabilitation Program, and MCCD's Weatherization Program.
Coordinating lead based paint assessment and abatement activities with property owners of housing units selected for participation in the SEP, including temporary relocation of residents to address emergency situations or when determined by MCCD staff to be appropriate during abatement activities.
Scheduling lead paint assessment and abatement activities with the homeowners and tenants, consultants, and contractors.
Reviewing and reporting the results of the lead paint risk assessments, lead paint abatement work, and clearance activities to the property owners, the Group, and EPA.
Continuously monitoring and evaluating the effectiveness of the SEP and making adjustments and improvements, as necessary, to ensure the effectiveness of the program.

3.5 SEP Implementation

As indicated in Section 3.1, the Group and MCCD finalized a contract for the SEP in November 2005. Pursuant to the contract, MCCD sent cash calls to the Group on a continuing basis while the SEP was being performed. Upon receipt of cash calls, the Group paid funds to MCCD to cover the estimated costs of MCCD's upcoming SEP work at the site. The funds were used by MCCD to administer the SEP (Section 3.4), to pay MCCD's consultants and contractors to perform lead paint risk assessments (Section 3.6), to temporarily relocate residents (Section 3.7) prior to lead paint activities when determined to be necessary, to perform lead paint abatement activities (Section 3.8) and clearance activities (Section 3.9), and to perform other SEP-related activities. As MCCD utilized the Group's funds, MCCD provided copies of invoices, bills, and other supporting documentation of its actual costs to the Group.

3.6 Risk Assessments

Upon receipt of a completed application from a property owner for participation in the SEP and after MCCD approved the applicant for participation in the SEP, MCCD authorized one of its consultants, a licensed risk assessor, to perform a lead paint risk assessment for the property. The goal of the risk assessment process was to determine whether any lead paint hazards were present on the residential properties.

MCCD authorized its consultant to perform a risk assessment within three work days after MCCD determined that the housing unit was eligible for participation in the SEP. MCCD's consultant was required to complete the risk assessment field work and submit samples to the laboratory within two weeks of receipt of MCCD's authorization to perform the risk assessment.

As defined in the SEP Work Plan, the risk assessments performed by MCCD's consultants typically involved the tasks defined on Table 2, which were performed in accordance with HUD guidelines and the SEP Work Plan.

Table 2 Risk Assessment Tasks
Interviewing the residents and completing a resident questionnaire.
Assessing the building condition, including the condition of paint on the interior and exterior of the housing unit.
Performing x-ray fluorescence (XRF) screening to determine the lead concentrations of painted surfaces.
Collecting wipe samples to determine the lead concentrations in dust within the housing unit and garage.
Collecting soil samples from play areas, gardens, and drip zones near building foundations.
Laboratory analysis of dust wipe samples, paint chip samples, and soil samples.
Evaluating the data collected during the risk assessment and preparing a report for submission to MCCD and the property owner to document the results of the risk assessment.

The procedures used by MCCD's consultants to collect samples, and the approximate number of samples to be collected based upon the size of the housing unit, were defined in the SEP Work Plan. Approximately 50 to 75 XRF screening measurements were taken during a typical risk assessment at a residential property.

MCCD's consultants evaluated the XRF screening data and laboratory results to determine whether lead paint abatement activities were required for each property. Specifically, MCCD's

consultants evaluated and compared the data to the risk assessment criteria summarized on Table 3 to determine whether lead paint abatement activities were required for the property.

Table 3 Risk Assessment Criteria	
Medium	Criteria
Dust	Abatement required when lead concentrations in dust wipe samples equaled or exceeded: <ul style="list-style-type: none"> ▪ 40 µg/ft² (floors) ▪ 200 µg/ft² (interior window sills)
Paint (based on XRF screening)	Abatement required when XRF screening indicated lead concentrations greater than or equal to 1.0 mg/cm ² .
Soil	Abatement required when lead concentration in soil exceeded 500 mg/kg (EPA's remedial action objective for the site). MCCD's consultants sometimes concluded that soil abatement was necessary when the HUD standard (400 mg/kg lead in bare soil areas) was exceeded.

Upon completion of the evaluation of XRF screening data and laboratory results collected during the risk assessment, MCCD's consultant prepared a risk assessment report which was provided to MCCD and the property owner. The risk assessment reports, which included letters that MCCD's consultants provided to the property owners, were used to notify the property owners about the lead paint hazards identified during the risk assessments.

Based upon the results of the risk assessments, MCCD and its consultants determined that lead paint abatement activities were required at 100% of the properties where risk assessments were performed. Using the results of the risk assessments, MCCD's consultants prepared property-specific work specifications for each property to define the abatement methods to be used to mitigate the lead paint hazards in the most cost-effective manner possible. However, due to circumstances beyond the control of MCCD, only 97.7% of the homes with risk assessments were abated and received closure reports. See Section 4.0 of this report for further details.

3.7 Temporary Resident Relocation

Based upon the results of the risk assessments and the scope of lead paint abatement activities that were required, MCCD determined whether it was necessary to temporarily relocate the residents from the housing unit while abatement activities were performed. MCCD followed the temporary relocation procedures defined in the SEP Work Plan, which are summarized on Table 4.

Table 4 Temporary Relocation Procedures
Written notice was provided to the home owner (at the time of application for participation in the SEP) that temporary relocation may be necessary under certain circumstances.
When determined by MCCD to be necessary, steps were taken to assure that the residents were temporarily relocated to a decent, safe, and sanitary dwelling.
Residents were relocated only for the period of time necessary to abate the lead paint hazards.
The homeowner was paid for out-of-pocket expenses associated with the relocation.
The resident was notified when lead paint abatement activities were completed (at that time, the displaced resident was advised to move back into the housing unit).

Examples of conditions that necessitated temporary relocation of residents were defined in the SEP Work Plan. As indicated in MCCD's Final Report, Lead-Based Paint Hazard Control (Appendix 1), 33 families received temporary relocation assistance while lead paint abatement activities were performed.

3.8 Abatement Activities

After MCCD prepared technical specifications for lead paint abatement activities, MCCD authorized one of its licensed contractors to perform lead abatement activities within the housing unit and in exterior areas when required. To ensure the lead abatement contractors had a clear understanding of the lead paint abatement work to be performed at each property, the technical specification writer met with the contractor at each property to review the scope of abatement activities.

Pursuant to local requirements, the abatement contractor notified the Illinois Department of Health at least 10 work days prior to the start of lead abatement activities on a property. Typically, the contractor commenced lead abatement activities within about 12 workdays after receipt of MCCD's authorization to perform the work.

As defined in the SEP Work Plan, lead paint abatement activities, which were performed to make the housing units safe from potential lead hazards, typically included the abatement activities summarized on Table 5.

<p style="text-align: center;">Table 5 Lead Paint Abatement Activities</p>
<p>Stabilizing lead paint hazards by:</p> <ul style="list-style-type: none"> ▪ Wet scraping and removing loose, chipped, and peeling lead based paint and repainting the surface to produce a smooth, cleanable, and maintained surface. ▪ Removing and replacing lead-containing building components (doors, window sills, etc.) with new, non lead-containing components. ▪ Encapsulating leaded surfaces by affixing, sealing, and caulking durable materials to enclose the exposed area of the leaded surface.
<p>Cleaning lead dust on surfaces by:</p> <ul style="list-style-type: none"> ▪ Using HEPA vacuum cleaners to remove lead dust found on floors, window sills, window wells, etc. ▪ Using trisodium phosphate (TSP) solution on HEPA-vacuumed surfaces to remove additional lead dust found on floors, window sills, window wells, etc.
<p>Removing lead-contaminated carpeting and either replacing the carpeting with new carpeting or cleaning and sealing the bare floor.</p>
<p>Excavating lead-impacted soil, properly disposing the soil off-site, and restoring and revegetating the excavated area (at several properties, lead paint chips were removed by vacuuming from bare soil and the soil was rototilled).</p>

Typically, lead paint abatement activities were completed for a housing unit within eight work days. MCCD staff and its consultants were responsible for ensuring that abatement activities were performed in accordance with the SEP Work Plan and technical specifications.

3.9 Clearance

Upon completion of lead paint abatement activities, MCCD's risk assessor collected post-abatement dust wipe samples, paint samples, and soil samples, as necessary, to determine the effectiveness of the abatement (e.g., by confirming that the post-abatement lead concentrations

were lower than the criteria identified on Table 3). After the clearance sampling was performed and the data evaluated, MCCD's risk assessor prepared a property-specific clearance report to confirm the effectiveness of the abatement. If the abatement did not initially achieve the criteria shown on Table 3, additional abatement and clearance activities were performed, as necessary. MCCD's risk assessor distributed the clearance reports to MCCD and the property owner.

MCCD's contractors performed their work in a manner to ensure that each property was restored to an equal, or better, condition than before the abatement was performed. MCCD's contractors took pre-abatement and post-abatement photographs, which are maintained in MCCD's files, to document the conditions on each property.

3.10 Progress Reports

For the duration of the SEP, MCCD prepared and submitted progress reports to the Group to summarize SEP activities being performed at the site. The Group subsequently submitted MCCD's reports to EPA and Illinois EPA.

The Group submitted MCCD's progress reports to EPA and Illinois EPA on a monthly basis from November 2005 to December 2012. Based upon EPA's subsequent approval, the Group submitted MCCD's reports to EPA and Illinois EPA on a quarterly basis from January-March 2013 to January-March 2017.

A copy of MCCD's final SEP quarterly report, which was submitted to EPA in March 2017, is provided in Appendix 4. The report documents the lead based paint risk assessment, abatement, and clearance activities performed by MCCD on a property-by-property basis and on a month-to-month basis from 2005 to 2017.

3.11 SEP Completion Schedule

The Consent Decree requires that the SEP be completed within five years after entry of the Consent Decree, unless EPA approved a longer time period in writing. Therefore, because the entry of the Consent Decree occurred on March 8, 2003, the completion date for the SEP was originally anticipated to be March 8, 2008.

The objective of the SEP, as defined in the Consent Decree, was to achieve a lead paint risk reduction in 50 high-priority homes, unless insufficient funds remained to accomplish that objective. By January 2008, MCCD had completed lead paint abatement activities on 57 properties; however, the \$2 million spending obligation required by the Consent Decree had not been met. Therefore, following discussions with EPA, the Group sent a letter to EPA on January 29, 2008 to request a three-year extension until March 8, 2011 to complete the SEP. EPA issued a letter to the Group on February 4, 2008 to extend the SEP completion date until March 8, 2011.

By February 2011, MCCD had completed lead paint abatement activities on more than 90 properties but had not spent \$2 million for the work. Therefore, following additional discussions with EPA, the Group sent a letter to EPA on February 18, 2011 to request a three-year time extension, until March 8, 2014, to complete the SEP. In the Group's letter, the Group indicated that with EPA's consent, the Group planned to use some of the remaining SEP funds to obtain access, collect additional soil samples, and remediate additional SEP properties with potentially unresolved soil issues. EPA issued a letter to the Group on March 1, 2011 to extend the SEP completion date until March 8, 2014.

By February 2014, MCCD had completed lead paint abatement activities on 115 properties but had not spent \$2 million for the work. Therefore, following discussions with EPA, the Group sent a letter to EPA on February 17, 2014 to request a three-year time extension, until March 8, 2017, to complete the SEP. In the Five-Year Review Report that EPA issued in March 2014, EPA acknowledged that the completion date for the SEP had been extended to March 8, 2017. Following discussions among representatives of the Group, EPA, and the U.S. Department of Justice in 2016, EPA reaffirmed that the SEP completion date was March 8, 2017 and determined that the SEP completion date would not be extended beyond March 8, 2017. The Group notified MCCD in writing in March 2016 that the SEP would not be extended beyond March 8, 2017.

Copies of communications regarding the SEP completion date are provided in Appendix 5.

SECTION 4.0 SEP PROPERTY LIST

As indicated in MCCD's Final Report, Lead-Based Paint Hazard Control (Appendix 1) and MCCD's final SEP quarterly progress report (Appendix 4), MCCD received 158 applications for participation in the SEP. Of those applications, 29 applications were denied by MCCD or the applicant subsequently declined to participate in the program. One of the applicants who was initially denied acceptance into the program was later accepted by MCCD after the applicant submitted the required application materials to MCCD. According to MCCD, approximately 61% of the applicants were the results of MCCD's outreach activities, 29% were referrals from landlords, 5% were from applications through Madison County's website, and 5% were referrals from MCCD's Weatherization Program.

As discussed in Section 3.0, MCCD performed lead paint risk assessments, lead paint abatements, and clearance activities pursuant to the SEP Work Plan. MCCD completed lead paint risk assessments at 130 properties, and lead paint abatement and clearance activities at 127 properties as part of the SEP.² The addresses of the properties where MCCD performed risk assessments, lead paint abatements, and clearance activities are provided on Table 6.

SEP Property No.	Street Address, City	Risk Assessment Report ^(a)	Final Clearance Report ^(a)
1	non-[REDACTED] Madison	✓	✓
2	non-[REDACTED] Madison	✓	✓
3	non-[REDACTED] Madison	✓	✓
4	non-[REDACTED] Granite City	✓	✓
5	non-[REDACTED] Madison	✓	✓
6	non-[REDACTED] Granite City	✓	✓
7	non-[REDACTED] Granite City	✓	✓
8	non-[REDACTED] Granite City	✓	✓
9	non-[REDACTED] Granite City	✓	✓
10	non-[REDACTED] Granite City	✓	✓
11	non-[REDACTED] Granite City	✓	✓
12	non-responsive [REDACTED] Granite City	✓	✓
13	non-[REDACTED] Granite City	✓	✓
14	non-[REDACTED] Granite City	✓	Per MCCD, property owner declined to have abatement work performed. No final clearance report.
15	non-[REDACTED] (quadplex) Granite City	✓	✓
16	non-responsive [REDACTED] (quadplex) Granite City	✓	✓
17	non-[REDACTED] (quadplex) Granite City	✓	✓
18	non-responsive [REDACTED] (quadplex) Granite City	✓	✓
19	non-[REDACTED] Granite City	✓	✓
20	non-responsive [REDACTED] Madison	✓	✓

² As shown on Table 6, lead paint abatement activities were not performed at three properties (2229 Dewey, 1743 Maple, and 1751 Olive) after the risk assessments had been completed for those properties.

Table 6 SEP Properties				
SEP Property No.	Street Address, City		Risk Assessment Report ^(a)	Final Clearance Report ^(a)
21	non-	Granite City	✓	✓
22	non-	Madison	✓	✓
23	non-responsive	Granite City	✓	✓
24	non-responsive	Granite City	✓	✓
25	non-	Madison	✓	✓
26	non-responsive	Granite City	✓	✓
27	non-	Granite City	✓	✓
28	non-	Granite City	✓	✓
29	non-	Granite City	✓	✓
30	non-responsive	Granite City	✓	✓
31	non-	Granite City	✓	✓
32	non-	Granite City	✓	See note (b)
33	non-	Granite City	✓	✓
34	non-	Granite City	✓	✓
35	non-	Granite City	✓	Per MCCD, no lead paint abatement work was performed (foreclosure). No final clearance report.
36	non-	Granite City	✓	✓
37	non-	Granite City	✓	✓
38	non-	Granite City	✓	✓
39	non-responsive, Apt. A	Granite City	✓	✓
40	non-responsive, Apt. B	Granite City	✓	✓
41	non-	Granite City	✓	Per MCCD, homeowner would not sign mortgage; no lead paint abatement work was performed. No final clearance report.
42	non-	Granite City	✓	✓
43	non-	Granite City	✓	✓
44	non- (main floor of residential duplex)	Granite City	✓	✓
45	non-responsive (second floor of residential duplex)	Granite City	✓	✓
46	non- (two-story residential dwelling)	Granite City	✓	✓
47	non-, Apt. A	Granite City	✓	✓
48	non-, Apt. B	Granite City	✓	✓
49	non-	Granite City	✓	✓
50	non- (part of duplex with 1727 Edison)	Granite City	✓	✓
51	non- (part of duplex with 1725 Edison)	Granite City	✓	✓
52	non-, Apt A (upstairs apartment; part of quadplex)	Granite City	✓	✓

SEP Property No.	Street Address, City	Risk Assessment Report^(a)	Final Clearance Report^(a)
53	non-██████████, Apt B (downstairs apartment; part of quadplex)	Granite City	✓
54	non-██████████, Apt A (upstairs apartment; part of quadplex)	Granite City	✓
55	non-██████████, Apt B (downstairs apartment; part of quadplex)	Granite City	✓
56	non-██████████	Granite City	✓
57	non-██████████	Granite City	✓
58	non-██████████	Granite City	✓
59	non-██████████	Granite City	✓
60	non-responsive ██████████ (reports identified as Apt. A or Apt. B refer to the apartment above the store)	Granite City	✓
61	non-██████████	Granite City	✓
62	non-██████████ St.	Granite City	✓
63	non-██████████.	Granite City	✓
64	non-██████████	Granite City	✓
65	non-██████████	Granite City	✓
66	non-██████████ (upstairs)	Granite City	✓
67	non-██████████ (downstairs)	Granite City	✓
68	non-responsive ██████████	Granite City	✓
69	non-responsive ██████████	Granite City	✓
70	non-responsive ██████████	Granite City	✓
71	non-██████████ Street	Granite City	✓
72	non-██████████ Blvd	Granite City	✓
73	non-██████████ Blvd.	Granite City	✓
74	non-██████████	Granite City	✓
75	non-██████████	Granite City	✓
76	non- non-██████████	Granite City	✓
77	non- (non-██████████ s	Granite City	✓
78	non-██████████	Granite City	✓
79	non-██████████	Madison	✓
80	non-responsive ██████████.	Granite City	✓
81	non-██████████.	Madison	✓
82	non-██████████	Granite City	✓
83	non-responsive ██████████	Granite City	✓
84	non-responsive ██████████	Granite City	✓
85	non-responsive ██████████	Granite City	✓
86	non-██████████	Madison	✓
87	non-██████████	Granite City	✓
88	non-██████████	Granite City	✓
89	non-██████████	Granite City	✓
90	non-██████████	Granite City	✓
91	██████████ R ██████████	Madison	✓

**Table 6
SEP Properties**

SEP Property No.	Street Address, City	Risk Assessment Report ^(a)	Final Clearance Report ^(a)
92	non-responsive	✓	✓
93	non-responsive	✓	✓
94	non-responsive	✓	✓
95	non-responsive	✓	✓
96	non-	✓	✓
97	non-	✓	✓
98	non-	✓	✓
99	non- Unit A	✓	✓
100	non- , Unit B	✓	✓
101	non-	✓	✓
102	non-	✓	✓
103	non-responsive	✓	✓
104	non- (downstairs)	✓	✓
105	non- , rear	✓	✓
106	non- (upstairs)	✓	✓
107	non-	✓	✓
108	non-	✓	✓
109	non-	✓	✓
110	non-	✓	✓
111	non-	✓	✓
112	non-	✓	✓
113	non-	✓	✓
114	non-	✓	✓
115	non-	✓	✓
116	non-	✓	✓
117	non-	✓	✓
118	non-	✓	✓
119	non- , Unit A	✓	✓
120	non- , Unit B	✓	✓
121	non- , Unit A	✓	✓
122	non- , Unit B	✓	✓
123	non-	✓	✓
124	non-	✓	✓
125	non-	✓	✓
126	non-	✓	✓
127	non-	✓	✓
128	non-	✓	✓
129	non-	✓	✓
130	non-	✓	✓

Notes:

- (a) A checkmark in the Risk Assessment Report or Final Clearance Report column indicates that the report is provided on the CD in Appendix 6.
- (b) At 2443 Edison, MCCD's consultant prepared a risk assessment report, which is included on the CD in Appendix 6. Lead paint abatement activities were performed at 2443 Edison, but one post-abatement sample collected near the front door of the property did not meet the clearance standards. Because the property owner declined MCCD's offer to perform additional abatement work at the front door, a final clearance report was not prepared.

As indicated in Section 3.6 and Section 3.9 respectively, MCCD's consultants prepared a risk assessment report to document the results of pre-abatement sampling activities for each property and a clearance report to document the results of post-abatement sampling activities for each property. MCCD and its consultants provided the risk assessment reports and clearance reports to the property owners.

The properties for which MCCD's consultants prepared a risk assessment report and clearance report are designated with a checkmark on Table 6. Copies of MCCD's risk assessment reports and clearance reports are provided on the CD in Appendix 6.

As shown on Table 6, MCCD performed lead paint abatement activities at 113 properties in Granite City and 14 properties in Madison. No participants in the SEP were located in Venice.

SECTION 5.0

ADDITIONAL SOIL SAMPLING AND REMEDIATION AT SEP PROPERTIES

5.1 Additional Evaluation of Soil on SEP Properties

As previously indicated, MCCD's consultants performed exterior soil sampling on the SEP properties as part of the risk assessment process. MCCD's contractors also performed soil abatement, as necessary, based on the results of soil sampling activities.

As MCCD completed its work and provided risk assessment reports to the Group, the Group reviewed MCCD's soil sampling data and compared MCCD's data to the results of soil testing previously performed by EPA and the Group as part of remedial activities at the site. The Group's spreadsheet, comparing MCCD's SEP soil sampling data to the results of soil sampling performed during remedial activities at the site (1993 to 2001), is provided in Appendix 7.

Based upon discussions with EPA while the SEP was being performed, and a subsequent meeting held on May 31, 2007 at MCCD's offices in Edwardsville, Illinois, it was agreed by EPA, MCCD, and the Group that SEP soil abatement activities for certain properties would be more effectively implemented as part of the Group's institutional controls program. Therefore, the SEP soil activities described in the original SEP Work Plan were deleted in the February 2008 revised SEP Work Plan and incorporated into the Group's revised Institutional Controls Work Plan submitted to EPA in February 2008.

Based upon the Group's review of the SEP soil data (summarized in Appendix 7) through March 2010, the Group identified 17 SEP properties, listed on Table 7, where the data warranted further consideration and consultation with EPA. Table 7 includes the addresses of these 17 SEP properties, a summary of the SEP soil sampling results, the results of the Group's evaluation and, following consultation with EPA, the manner by which each property would be addressed by the Group.

Table 7 SEP Properties Evaluated as Part of Institutional Controls Program						
Property No.	SEP Property No.	Property Address Street/City	Remedial Activities	Supplemental Environmental Project		Method to Address Property as Part of Institutional Controls Program
				SEP Soil Sampling Results (Excerpts from MCCD's Risk Assessment Reports)	SEP Soil Abatement	
1	3	no [REDACTED] [REDACTED] [REDACTED]	During remedial activities, the property owner denied access for soil sampling.	Soil (front yard, bare) = 240 mg/kg. Soil (back yard, bare) = 360 mg/kg.	None.	The Group will address the property as a denied access property and will seek access from the property owner to perform soil sampling pursuant to the Institutional Controls Work Plan.
2	5	non- [REDACTED] responsi [REDACTED]	During remedial activities, the Group performed soil sampling and determined that remedial activities were not required.	Soil (front yard, bare) = 550 mg/kg. Soil (back yard, bare) = 420 mg/kg.	Mulched around foundation; rototilled front and back yards, fertilized and sodded (1693 sf).	MCCD's soil sampling results suggest that there may be an unresolved issue. Therefore, the Group will seek access from the owner to perform soil sampling pursuant to the Institutional Controls Work Plan.

Table 7
SEP Properties Evaluated as Part of Institutional Controls Program

Property No.	SEP Property No.	Property Address Street/City	Remedial Activities	Supplemental Environmental Project		Method to Address Property as Part of Institutional Controls Program
				SEP Soil Sampling Results (Excerpts from MCCD's Risk Assessment Reports)	SEP Soil Abatement	
3	8	non-responsi	During remedial activities, the Group performed soil sampling and determined that remedial activities were not required.	Soil (back yard) = 1100 mg/kg	Rototilled, fertilized, and sodded (1504 sf).	MCCD's soil sampling results suggest that there may be an unresolved issue. Therefore, the Group will seek access from the owner to perform soil sampling pursuant to the Institutional Controls Work Plan.
4	15	non-responsiv (quadplex)	During remedial activities, the Group performed soil sampling and determined that remedial activities were not required.	Soil (front yard, bare) = 2100 mg/kg. Soil (back yard, drip line, bare) = 2800 mg/kg.	Mulched and placed rock around foundation; rototilled, fertilized, and sodded bare areas (1502 sf).	MCCD's soil sampling results suggest that there may be an unresolved issue. Therefore, the Group will seek access from the owner to perform soil sampling pursuant to the Institutional Controls Work Plan.
5	28	non-responsiv	During remedial activities, the property owner denied access for remediation after soil sampling was performed.	Soil (side yard, bare) = 440 mg/kg.	None.	The Group will address the property as a denied access property and will seek access from the property owner to perform soil sampling pursuant to the Institutional Controls Work Plan.
6	29	non-responsiv	The address is not listed in the Group's records for remedial activities.	Soil (front yard, bare) = 830 mg/kg. Soil (back yard, bare) = 380 mg/kg.	Mulched and placed rock around foundation; rototilled, fertilized, and sodded (677 sf total).	MCCD's soil sampling results suggest that there may be an unresolved issue. Therefore, the Group will seek access from the property owner to perform soil sampling pursuant to the Institutional Controls Work Plan.
7	35	non-responsiv	During remedial activities, the property owner denied access for soil sampling.	Soil (front yard, bare) = 690 mg/kg. Soil (back yard, bare) = 30 mg/kg.	House in foreclosure. No SEP abatement performed.	The Group will address the property as a denied access property and will seek access from the property owner to perform soil sampling pursuant to the Institutional Controls Work Plan.
8	38	non-responsi	During remedial activities, the Group conducted soil sampling activities and determined that soil remediation was not required.	Soil (foundation, front side, bare) = 970 mg/kg. Soil (foundation, back side, bare) = 1200 mg/kg. Soil (back yard, bare) = 470 mg/kg. Soil (driveway, bare) = 390 mg/kg.	Mulched and placed rock around foundation; rototilled, fertilized, and sodded (2079 sf).	Because the Group had already sampled the soil at this property and determined that remedial activities were not required, the Group does not believe that additional sampling is necessary. The Group will request that MCCD abate the soil in the drip zone, if not already completed by MCCD.

Table 7
SEP Properties Evaluated as Part of Institutional Controls Program

Property No.	SEP Property No.	Property Address Street/City	Remedial Activities	Supplemental Environmental Project		Method to Address Property as Part of Institutional Controls Program
				SEP Soil Sampling Results (Excerpts from MCCD's Risk Assessment Reports)	SEP Soil Abatement	
9	39	non- Apt. A, Granite City	The address is not listed in the Group's remedial action records.	Soil (foundation, side, bare) = 520 mg/kg. Soil (back yard, bare) = 430 mg/kg. Soil (driveway, bare) = 320 mg/kg.	Mulched around foundation; rototilled, fertilized, and sodded.	Because the address is not listed in the Group's remedial action records, the Group will attempt to determine whether the property was sampled and remediated (as part of neighboring properties with different addresses, etc.) at the time that remedial activities were performed. If the Group previously sampled the soil and conducted remedial activities if required, the Group will request that MCCD abate the soil in the drip zone, if MCCD has not already addressed the drip zone. If the Group is unable to confirm that its contractor previously sampled the soil and conducted remedial activities if required, the Group will seek access from the property owner to perform soil sampling pursuant to the Institutional Controls Work Plan.
10	43	non- Granite City	During remedial activities, the Group conducted soil sampling activities and determined that remedial action was not required.	Soil (drip line side B) = 540 mg/kg.	No action taken.	Because the Group had already sampled the soil and determined that remedial action was not required, the Group does not believe that additional sampling is necessary. The Group will request that MCCD abate the soil in the drip zone, if not already completed by MCCD.
11	46	non- Granite City	The address is not listed in the Group's remedial action records.	Soil (back yard, foundation area) = 880 mg/kg.	None.	Because the address is not listed in the Group's remedial action records, the Group will attempt to determine whether the property was sampled and remediated (as part of neighboring properties with different addresses, etc.) at the time that remedial activities were performed. If the Group previously sampled the soil and

<p align="center">Table 7 SEP Properties Evaluated as Part of Institutional Controls Program</p>						
Property No.	SEP Property No.	Property Address Street/City	Remedial Activities	Supplemental Environmental Project		Method to Address Property as Part of Institutional Controls Program
				SEP Soil Sampling Results (Excerpts from MCCD's Risk Assessment Reports)	SEP Soil Abatement	
						conducted remedial activities if required, the Group will request that MCCD abate the soil in the drip zone, if MCCD has not already addressed the drip zone. If the Group is unable to confirm that its contractor previously sampled the soil and conducted remedial activities if required, the Group will seek access from the property owner to perform soil sampling pursuant to the Institutional Controls Work Plan.
12	52	non-██████████, Apt. A, Granite City (upstairs apartment; part of quadplex)	The address is not listed in the Group's remedial action records.	Soil (driveway) = 480 mg/kg. Soil (sidewalk) = 550 mg/kg.	Rock placed in driveway 4 inches deep. Rototilled, fertilized, and sodded wall C, and stabilized walkway.	MCCD's soil sampling results suggest that there may be an unresolved issue. Therefore, the Group will seek access from the property owner to perform soil sampling pursuant to the Institutional Controls Work Plan.
	Note: 2427 Edison will be addressed as part of 2429 Edison. ¹					
	54	non-██████████, Apt. A, Granite City (upstairs apartment; part of quadplex)	The address is not listed in the Group's remedial action records.	Soil (sidewalk) = 33,000 mg/kg. Soil (foundation) = 1,200 mg/kg.	Same as 2429 Edison, Apt. A.	MCCD's soil sampling results suggest that there may be an unresolved issue. Therefore, the Group will seek access from the property owner to perform soil sampling pursuant to the Institutional Controls Work Plan.
	Note: non-██████████ will be addressed as part of non-██████████.					
13	57	non-██████████ Granite City	During remedial activities, the Group excavated six inches of lead-impacted soil at the property.	Soil (house foundation, wall D, bare) = 3,000 mg/kg. Soil (back yard, play area) = 86 mg/kg. Soil (front yard, play area) = 24 mg/kg.	Rototilled, fertilized, and sodded wall D.	Because the Group had already sampled and remediated soil at the property, the Group does not believe that additional sampling is necessary. The Group will request that MCCD abate the soil in the drip zone, if not already completed by MCCD.
14	63	non-██████████ Granite City	The address is not listed in the Group's remedial action records.	Soil (B side, drip line) = 680 mg/kg.	No action taken.	Because the address is not listed in the Group's remedial action records, the Group will attempt to determine whether the property was sampled and

Table 7
SEP Properties Evaluated as Part of Institutional Controls Program

Property No.	SEP Property No.	Property Address Street/City	Remedial Activities	Supplemental Environmental Project		Method to Address Property as Part of Institutional Controls Program
				SEP Soil Sampling Results (Excerpts from MCCD's Risk Assessment Reports)	SEP Soil Abatement	
						remediated (as part of neighboring properties with different addresses, etc.) at the time that remedial activities were performed. If the Group previously sampled the soil and conducted remedial activities if required, the Group will request that MCCD abate the soil in the drip zone, if MCCD has not already addressed the drip zone. If the Group is unable to confirm that its contractor previously sampled the soil and conducted remedial activities if required, the Group will seek access from the property owner to perform soil sampling pursuant to the Institutional Controls Work Plan.
15	72	non- Blvd, Granite City	During remedial activities, the Group excavated three inches of lead-impacted soil.	Soil (front yard, bare soil) = 53 mg/kg. Soil (house foundation, wall D, bare soil) = 250 mg/kg. Soil (house foundation, wall C, bare soil) = 1,900 mg/kg.	No soil abatement performed.	Because the Group had already sampled and remediated soil at the property, the Group does not believe that additional sampling is necessary. The Group will request that MCCD abate the soil in the drip zone, if not already completed by MCCD.
16	74	non- Granite City	During remedial activities, the Group sampled the soil and determined that remedial activities were not required.	Soil (side yard A, 1/2-inch depth) = 420 mg/kg. Soil (side yard C, 1/2-inch depth) = 1,100 mg/kg.	No soil abatement performed.	MCCD's soil sampling results suggest that there may be an unresolved issue. Therefore, the Group will seek access from the property owner to perform soil sampling pursuant to the Institutional Controls Work Plan.
17	80	non- City	During remedial activities, the Group excavated three inches of lead-impacted soil at the property.	Front yard (house foundation, bare soil) = 2,800 mg/kg. Side yard (house foundation, bare soil) = 300 mg/kg. Prior to MCCD's involvement, the property owner was renovating the exterior of the house. Paint chips	Paint chips originating from the property owner's exterior building renovation activities were removed from the soil by HEPA vacuuming. After paint chips were removed, 2-3 inches of soil were	The Group and MCCD excavated impacted soil at the property on two separate occasions. No further action is necessary.

Table 7 SEP Properties Evaluated as Part of Institutional Controls Program						
Property No.	SEP Property No.	Property Address Street/City	Remedial Activities	Supplemental Environmental Project		Method to Address Property as Part of Institutional Controls Program
				SEP Soil Sampling Results (Excerpts from MCCD's Risk Assessment Reports)	SEP Soil Abatement	
				were visible on the soil at the time of MCCD's soil sampling.	excavated / disposed off-site. Composite soil samples collected following removal of paint chips were collected at depths of 0.5 inches, 3 inches, and 6 inches below the surface and were tested to contain lead concentrations below the laboratory detection limit (25 mg/kg).	
Note that SEP Property 52 (non-) and SEP Property 54 (non-) are the same property.						

Based upon the Group's evaluation (Table 7), the Group proposed in the Institutional Controls Work Plan to address the 17 SEP properties as summarized on Table 8.

Table 8 Summary of Plans to Address 17 SEP Properties as Part of Institutional Controls Activities		
Group No.	SEP Properties	Method to Address SEP Properties
1	non-responsive	At the time remedial activities were performed, the Group was unable to obtain access from the property owners. The Group will address the properties as denied access properties and will seek access from the property owners to perform soil sampling pursuant to the Institutional Controls Work Plan.
2	non-responsive	During remedial activities, the Group sampled the soil and determined that remedial activities were not required at 1009 Iowa, 2330 Iowa, 2435 Delmar, and 2305A Benton. The addresses 2436 Delmar and 2427/2429 Edison are not listed in the Group's remedial action records. MCCD's soil data (one or more sample results) collected as part of the SEP suggest that the lead concentrations in the soil at the properties may exceed 500 mg/kg in some areas (at some of the properties, MCCD has performed soil abatement activities consisting of rototilling, fertilizing, sodding, mulching, etc.). Because MCCD's soil sampling data suggest that there may be unresolved issues at the properties, the Group will seek access from the property owners to perform soil sampling pursuant to the Institutional Controls Work Plan.
3	non-responsive	The addresses are not listed in the Group's remedial action records. The results of the MCCD's sampling activities as part of the SEP suggest that the lead concentrations in the soil may exceed 500 mg/kg only in the drip zones around the houses. For these reasons, the Group will attempt to determine whether the properties were sampled and remediated (as part of neighboring properties with different addresses, etc.) at the time that remedial activities were performed. If the Group previously sampled the soil and conducted remedial activities if required, the Group will request that the MCCD abate the soil in the drip zones,

Table 8 Summary of Plans to Address 17 SEP Properties as Part of Institutional Controls Activities		
Group No.	SEP Properties	Method to Address SEP Properties
		if the MCCD has not already addressed the drip zones. If the Group is unable to confirm that its contractor previously sampled the soil and conducted remedial activities if required, the Group will seek access from the property owners to perform soil sampling pursuant to the Institutional Controls Work Plan.
4	non-responsive	At the time remedial activities were performed, the Group either excavated lead-impacted soil or determined that remedial activities were not necessary. The MCCD's soil sampling activities as part of the SEP suggest that lead concentrations above 500 mg/kg may be present only in the drip zones. Because the Group has already addressed the soil at these properties, the Group does not believe that additional sampling is necessary. The Group will request that the MCCD abate the soil in the drip zones, if the MCCD has not already addressed the drip zones.
5	non-	During remedial activities, the Group excavated three inches of lead-impacted soil at the property. The owner's exterior renovation activities in 2009 (prior to MCCD involvement) caused paint chips to fall onto soil that had previously been remediated by the Group. As part of the MCCD's SEP abatement activities in 2009, the MCCD's contractor removed the paint chips from the soil surface by HEPA vacuuming, excavated surface soil (2 to 3 inches) in the areas affected by the paint chips, collected soils samples at various locations and depths (the lead concentrations were all below the 25 mg/kg laboratory detection limit), and placed clean soil into the excavated area. No further action is necessary.

The information on Table 7 and Table 8 was included in Section 8.0 of the Institutional Controls Work Plan. As previously indicated, EPA issued letters (Appendix 2) on March 23, 2011 to approve Section 8.0 and Section 9.0 of the Institutional Controls Work Plan.

The results of the Group's additional evaluation of the 17 SEP properties are summarized on Table 9.

Table 9 Results of Additional Evaluation of Soil at 17 SEP Properties			
Property No.	SEP Property No.	Property Address Street/City	Evaluation Results
1	3	non-responsive	The property owner signed the Group's access agreement in October 2010. Based on soil sampling results, the Group determined in consultation with EPA that drip zone soil remediation was required. The Group sent a letter to the property owner in August 2011 to advise her to contact the MCCD for potential participation in the SEP.
2	5	non-responsive	The property owners signed the Group's access agreement in October 2010. Based on soil sampling results, the Group determined in consultation with EPA that drip zone soil remediation was required. The Group sent a letter to the property owners in August 2011 to advise them to contact the MCCD for potential participation in the SEP.

<p align="center">Table 9 Results of Additional Evaluation of Soil at 17 SEP Properties</p>			
Property No.	SEP Property No.	Property Address Street/City	Evaluation Results
3	8	non- responsi	The property owner signed the Group's access agreement in October 2010. Based on soil sampling results, the Group determined in consultation with EPA that drip zone soil remediation was required. The Group sent a letter to the property owner in August 2011 to advise her to contact the MCCD for potential participation in the SEP.
4	15	non- Granite City	The property owner signed the Group's access agreement in January 2011. Based on soil sampling results, the Group determined in consultation with EPA that yard soil and drip zone soil remediation was required. The Group sent a letter to the property owner in August 2011 to provide the soil sampling results and advise her that the Group will perform remedial activities at the property at a later date.
5	28	non- Granite City	The property owner signed the Group's access agreement in October 2010. Based on soil sampling results, the Group determined in consultation with EPA that yard soil and drip zone soil remediation was required. The Group sent a letter to the property owner in August 2011 to provide the soil sampling results and advise him that the Group will perform remedial activities at the property at a later date.
6	29	non- Granite City	The property owners signed the Group's access agreement in October 2010. Based on soil sampling results, the Group determined in consultation with EPA that drip zone soil remediation was required. The Group sent a letter to the property owners in August 2011 to advise them to contact the MCCD for potential participation in the SEP.
7	35	non- Granite City	The Group was unable to obtain a response from the property owner by mail (two attempts), certified mail, knocking on front door, and providing an information packet at the front door. The Group also sent a letter and access agreement which were delivered to the property by delivery confirmation in July/August 2011. The property owner did not respond.
8	38	non- Granite City	At the time that remedial activities were performed, EPA and/or the Group and EPA collected soil samples and determined that remedial activities were not required. Later, the MCCD performed lead paint abatement activities as part of the SEP. The MCCD's soil sampling activities as part of the SEP indicated that lead concentrations above 500 mg/kg were present only in the drip zone. As part of SEP soil abatement activities, the MCCD removed paint chips from soil surface by HEPA vacuum, installed black landscape barrier and placed mulch and/or rock to a four-inch depth above the landscape barrier. Soil within the yard area that contained a lead concentration of 470 mg/kg was rototilled to a six-inch depth and sodded.
9	39	non- Granite City	After the property owner granted access orally, the Group's project coordinator sent a letter to the property owner in March 2011 to confirm that he granted access. Based on soil sampling results, the Group determined in consultation with EPA that drip zone soil remediation was required. The Group sent a letter to the property owner in August 2011 to advise him to contact the MCCD for potential participation in the SEP.

Table 9
Results of Additional Evaluation of Soil at 17 SEP Properties

Property No.	SEP Property No.	Property Address Street/City	Evaluation Results
10	43	non- Granite City	The property owners signed the Group's access agreement in October 2010. Based on soil sampling results, the Group determined in consultation with EPA that drip zone soil remediation was required. The Group sent a letter to the property owners in August 2011 to advise them to contact the MCCD for potential participation in the SEP.
11	46	non- Granite City	The non- street address did not exist at the time that the Group and EPA performed remedial activities. During remedial activities, EPA and/or the Group and EPA collected soil samples at non- (the non- street address does not currently exist) and determined that remedial activities were not required. EPA and/or the Group and EPA also determined that remedial activities were not required on the neighboring properties (non-responsive). Based on this information, the Group believes that the non- property was identified by another neighboring address at the time the property was sampled by EPA or the Group during remedial activities.
12	52 ¹	non- Granite City	The property owner signed the Group's access agreement in October 2010. Based on soil sampling results, the Group determined in consultation with EPA that yard soil and drip zone soil remediation was required. The Group sent a letter to the property owner in August 2011 to provide the soil sampling results and advise her that the Group will perform remedial activities at the property at a later date.
	54	non- Granite City	The property owner signed the Group's access agreement in October 2010. Based on soil sampling results, the Group determined in consultation with EPA that yard soil and drip zone soil remediation was required. The Group sent a letter to the property owner in August 2011 to provide the soil sampling results and advise her that the Group will perform remedial activities at the property at a later date.
13	57	non- Granite City	At the time that remedial activities were performed, EPA and/or the Group and EPA collected soil samples and remediated soil to a six-inch depth. Later, the MCCD performed lead paint abatement activities as part of the SEP. The MCCD's soil sampling activities as part of the SEP indicated that lead concentrations above 500 mg/kg were present in only one drip zone soil sample. As part of SEP soil abatement activities, the MCCD removed paint chips from the soil surface by HEPA vacuum, rototilled the soil to a depth of six inches, and placed sod over the area.
14	63	non- Granite City	The non-responsive address did not exist at the time the Group and EPA performed remedial activities. However, EPA and/or the Group and EPA collected soil samples on the neighboring properties (street addresses non- non-responsive) that existed at the time of remedial activities and addressed the properties, as appropriate (e.g., remedial activities were determined not to be necessary at non-responsive, and soil was excavated to a depth of three inches at non-). Based on this information, the Group believes that non- was addressed during remedial activities as either part of non-responsive.

Table 9 Results of Additional Evaluation of Soil at 17 SEP Properties			
Property No.	SEP Property No.	Property Address Street/City	Evaluation Results
15	72	non- Granite City	The property owner signed the Group's access agreement in March 2011. Based on soil sampling results, the Group determined in consultation with EPA that drip zone soil remediation was required. The Group sent a letter to the property owner in August 2011 to advise him to contact the MCCD for potential participation in the SEP.
16	74	non- Granite City	The Group sent a letter in 3/2011 to confirm that the property owner had provided access for soil sampling. The Group received a signed access agreement from the property owner in 11/2011. Based on soil sampling results, the Group sent a letter in August 2011 to advise the property owner that no further action is required.
17	80	non- Granite City	The Group and MCCD excavated impacted soil at the property on two separate occasions. No further action is necessary.
¹ Note that SEP Property 52 (non-) and SEP Property 54 (non-) are the same property.			

5.2 SEP Properties Where No Further Remediation was Necessary

Based upon the information summarized on Table 9, the Group determined in consultation with EPA that no further action was required at the six SEP properties listed on Table 10.

Table 10 SEP Properties Where No Further Action was Necessary	
SEP Property No.	Property Address
38	non-responsive
46	non-responsive
57	non-responsive
63	non-responsive
74	non-responsive
80	non-responsive

5.3 SEP Properties with Drip Zone Soil Containing Lead Concentrations Above 500 mg/kg

Based upon the Group's soil sampling activities, which were performed using the approved protocols defined in Section 9.0 of the Institutional Controls Work Plan, the Group determined, as indicated on Table 9 and in consultation with EPA, that the lead concentrations exceeded 500 mg/kg only in the drip zone soil at the SEP properties listed on Table 11.

Table 11 SEP Properties with Lead Concentrations Above 500 mg/kg in Drip Zone Soil Only	
SEP Property No.	Property Address
3	non-responsive
5	non-responsive
8	non-responsive
29	non-responsive
39	non-responsive
43	non-responsive
72	non-responsive

In consultation with EPA, the Group sent letters to the owners of the seven properties listed on Table 11 to encourage them to contact MCCD for potential additional participation in the SEP.

5.4 Properties with Yard Soil Containing Lead Concentrations Above 500 mg/kg

Based upon the Group's soil sampling activities, the Group determined in consultation with EPA that yard remediation was required at the three SEP properties listed on Table 12.

Table 12 SEP Properties with Yard Soil Containing Lead Concentrations Above 500 mg/kg	
SEP Property No.	Property Address
15	non-responsive
28	non-responsive
52/54	non-responsive

Following EPA's approval of the Group's Updated Remedial Action Work Plan for Residential Soil Remediation and 1555 State Street Property Sidewalk Replacement, the Group's contractor, EWI, performed remedial activities on the non-responsive and non- properties in 2015. EWI performed remedial activities on the Group's behalf on the non- property (which was also a denied access property) in 2016. The remedial actions performed by the Group on these properties in 2015-2016 will be addressed in EWI's remedial action report which will be submitted to EPA at a later date.

The Group and EPA were unable to obtain access to the non-responsive (SEP Property No. 35).

SECTION 6.0 CHRONOLOGY

The major events associated with the SEP are summarized on Table 13.

Table 13 SEP Chronology	
Date	Activities
5/8/2000	EPA press release, recognizing the nearly completed residential soil remediation activities at the site
5/10/2000	EPA media/press event, announcing release of SEP funds
3/8/2003	Effective date of Consent Decree.
4/28/2003	Letter from Group's counsel to EPA in regard to an anticipated date for preparation of the SEP Work Plan and to seek clarification from EPA related to SEP implementation.
8/6/2003	Submission of MCCD's draft July 2003 SEP Work Plan to EPA.
12/22/2003	Receipt of EPA's draft comments on SEP Work Plan.
6/2004	MCCD submission of revised SEP Work Plan to EPA, following additional communications among the Group, EPA, and MCCD, and exchange of drawings showing the boundaries of the residential areas at the site.
8/16/2004	Conference call with EPA and EPA letter approving the June 2004 SEP Work Plan with modifications.
8/31/2004	Approved version of SEP Work Plan, addressing EPA's August 2004 comments, submitted to EPA.
9/1/2004	Receipt of EPA's August 16, 2004 (revised) letter, approving the SEP Work Plan with modifications.
March 2005	Initiation of MCCD's efforts to accept applications for participation in the SEP.
4/13/2005	Public kick-off event held by MCCD for the SEP.
April 2005	Initial MCCD efforts to perform SEP lead paint risk assessments at residential properties.
November 2005	Start of MCCD lead paint abatement at first housing unit as part of the SEP.
11/22/2005	Finalization of SEP contract between the Group and MCCD.
November 2005	Initial SEP monthly report submitted to EPA (reports were submitted to EPA on a monthly basis until December 2012).
2/22/2006	Group's letter to EPA, requesting concurrence that MCCD's cost documents satisfy the Consent Decree requirements of "appropriate documentation of SEP costs."
11/3/2006	Group's letter to EPA, requesting concurrence that MCCD's cost documents satisfy the Consent Decree requirements of "appropriate documentation of SEP costs."
1/23/2007	Resubmission of August 2004 SEP Work Plan to EPA.
3/20/2007	EPA letter regarding potential means to increase public participation in the SEP.
5/31/2007	Based upon previous discussions with EPA, and a subsequent meeting held on May 31, 2007 among representatives of EPA, MCCD, and the Group, consensus was reached that SEP soil abatement activities for certain properties would be more effectively implemented as part of the Group's Institutional Controls Work Plan.
1/29/2008	Letter from Group to EPA to request three-year time extension until 3/8/2011 to complete the SEP.
2/4/2008	EPA letter extending the SEP completion date to 3/8/2011.

Table 13 SEP Chronology	
Date	Activities
2/28/2008	Submission of a revised version of the SEP Work Plan to EPA to address EPA's comments.
5/7/2010	Updated version of SEP Work Plan submitted to EPA to provide general updates and to reflect that the SEP soil sampling activities for certain properties had been relocated into the revised version of the Institutional Controls Work Plan submitted to EPA in March 2010.
October 2010	Initial Group efforts to seek access from denied access property owners and certain SEP properties.
2/18/2011	Letter from Group to EPA to request three-year time extension until 3/8/2014 to complete the SEP.
3/1/2011	EPA letter extending SEP completion date to 3/8/2014.
3/23/2011	EPA letters approving Section 8.0 and Section 9.0 of the Institutional Controls Work Plan.
11/11/2011	Draft Addendum 1 to the SEP Work Plan issued to EPA to provide the protocol for soil sampling within the drip zones of the homes being addressed as part of the SEP.
April 2013	Initial SEP quarterly progress report (for January-March 2013) submitted to EPA. SEP quarterly progress reports were subsequently submitted to EPA on a quarterly basis until the conclusion of the SEP.
2/17/2014	Letter from Group to EPA to request three-year time extension until 3/8/2017 to complete the SEP.
2015-2016	Group's efforts to complete soil remediation at four SEP properties.
3/14/2016	Letter from Group to advise MCCD that EPA had determined that it would not extend the SEP completion date beyond 3/8/2017.
February 2017	Completion of final MCCD lead paint abatement at housing unit.
March 2017	Submission of final quarterly SEP report to EPA.

SECTION 7.0 SEP COSTS

As indicated in Section 3.5, MCCD sent cash calls to the Group on a continuing basis while the SEP was being performed. Upon receipt of MCCD's cash calls, the Group paid the requested funds to MCCD to cover the estimated costs of MCCD's upcoming SEP activities. Upon completion of SEP work, and on a continuing basis while the SEP was being performed, MCCD provided copies of checks, invoices, labor charges, and other supporting information to the Group to document MCCD's actual costs for implementing the SEP. Because the Consent Decree requires the Group to itemize its costs for implementing the SEP, the Group sent letters (Appendix 8) to EPA on February 22, 2006 and November 3, 2006 to confirm that the documents being provided to the Group by MCCD satisfied the Consent Decree requirements for "appropriate documentation of SEP costs."

In response to MCCD's cash calls, the Group paid a total of \$1,115,000 to MCCD from 2005 to 2016 to implement the SEP. Copies of MCCD's letters, invoice spreadsheets, checks, receipts, bills from consultants and contractors, and other documentation of MCCD's actual expenditures to implement the SEP are provided on the CD in Appendix 6. MCCD's actual expenditures to implement the SEP were \$1,104,202.72; therefore, MCCD returned a check to the Group in the amount of \$10,797.28 for the unspent SEP funds.

As MCCD provided documentation of its SEP costs to the Group, the Group maintained itemized listings of MCCD's expenditures. The Group's itemized lists of MCCD's expenditures are provided on the spreadsheets identified on Table 14.

Table 14 Itemized Lists of SEP Expenditures	
Itemized list of SEP expenditures by task (provided in Appendix 9)	
Itemized list of SEP expenditures by address (provided in Appendix 10)	

Based upon the information provided on the spreadsheet in Appendix 9, an itemized listing of the Group's SEP expenditures by task is provided on Table 15.

Table 15 Itemized Listing of SEP Expenditures by Task	
Task	SEP Expenditures
MCCD labor/expenses	\$83,754.27
Property ownership reports/other MCCD direct costs	25,697.07
Risk assessment costs	52,049.95
Specifications/write-up	26,555.25
Resident relocation/miscellaneous costs	31,136.31
Lead abatement costs	853,359.87
Clearance testing costs	31,650.00
Total SEP Expenditures:	\$1,104,202.72

As indicated in Section 5.0, the Group also incurred costs for work performed by EWI related to certain SEP properties. Supporting documentation for EWI's expenditures related to SEP properties is provided in Appendix 11 and is itemized on Table 16.

Table 16 SEP-Related Costs for Work Performed by EWI	
Task	Expenditures
Soil sampling, laboratory analysis, and reporting	\$26,850.80
Soil remediation (2015)	14,363.80
Total Expenditures:	\$41,214.60

Based upon the information summarized on Table 15 and Table 16, the Group incurred total SEP-related expenses as indicated on Table 17.

Table 17 Total SEP Expenditures	
Task	Expenditures
Work performed by MCCD	\$1,104,202.72
Work performed by EWI	41,214.60
Total Expenditures:	\$1,145,417.32

The Group's contractor, EWI, also performed remedial activities on the non-responsive (SEP Property No. 129) in 2016. The Group's remedial costs for the non-responsive (which was also a denied access property) are not included in Table 16 and Table 17. The costs incurred by the Group for work performed by the Group's project coordinator are also not included in the Group's SEP expenditures.

As reported to EPA on a continuing basis while the SEP was performed, public interest in the SEP was less than originally anticipated. Despite MCCD's diligent efforts to obtain additional SEP participants while the SEP was being performed, MCCD was unable to spend all of the \$2,000,000 set aside for the SEP. For that reason, the Group will pay the balance of the unspent SEP funds (\$854,582.68) to EPA pursuant to the Consent Decree within no more than 30 days after receiving a written request from EPA.

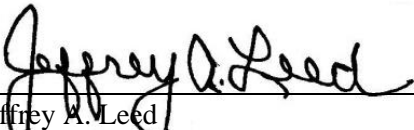
SECTION 8.0 SUMMARY AND CERTIFICATION

8.1 Summary

The Group and MCCD performed a SEP which resulted in the abatement of lead paint hazards on 127 housing units within the boundaries of the site. Of the 127 housing units, 113 units were located in Granite City and 14 units were located in Madison. According to MCCD's Final Report, Lead-Based Paint Hazard Control (Appendix 1), children under the age of 6 years resided in 46 housing units (approximately 36%) of the 127 units where lead paint abatement activities were performed. Although MCCD was unable to spend \$2 million that was required by the Consent Decree to be spent for the SEP, the objective of abating hazards from lead based paint in no less than 50 high-priority homes was achieved.

8.2 Certification

To the best of my knowledge, after thorough investigation, I certify that the information contained in or accompanying this submission is true, accurate, and complete, and that the SEP has been fully implemented pursuant to the provisions of this Consent Decree.



Jeffrey A. Leed
Project Coordinator, On behalf of the
NL Industries/Taracorp Superfund Site Group



Figure 1
NL Industries/Taracorp Superfund Site

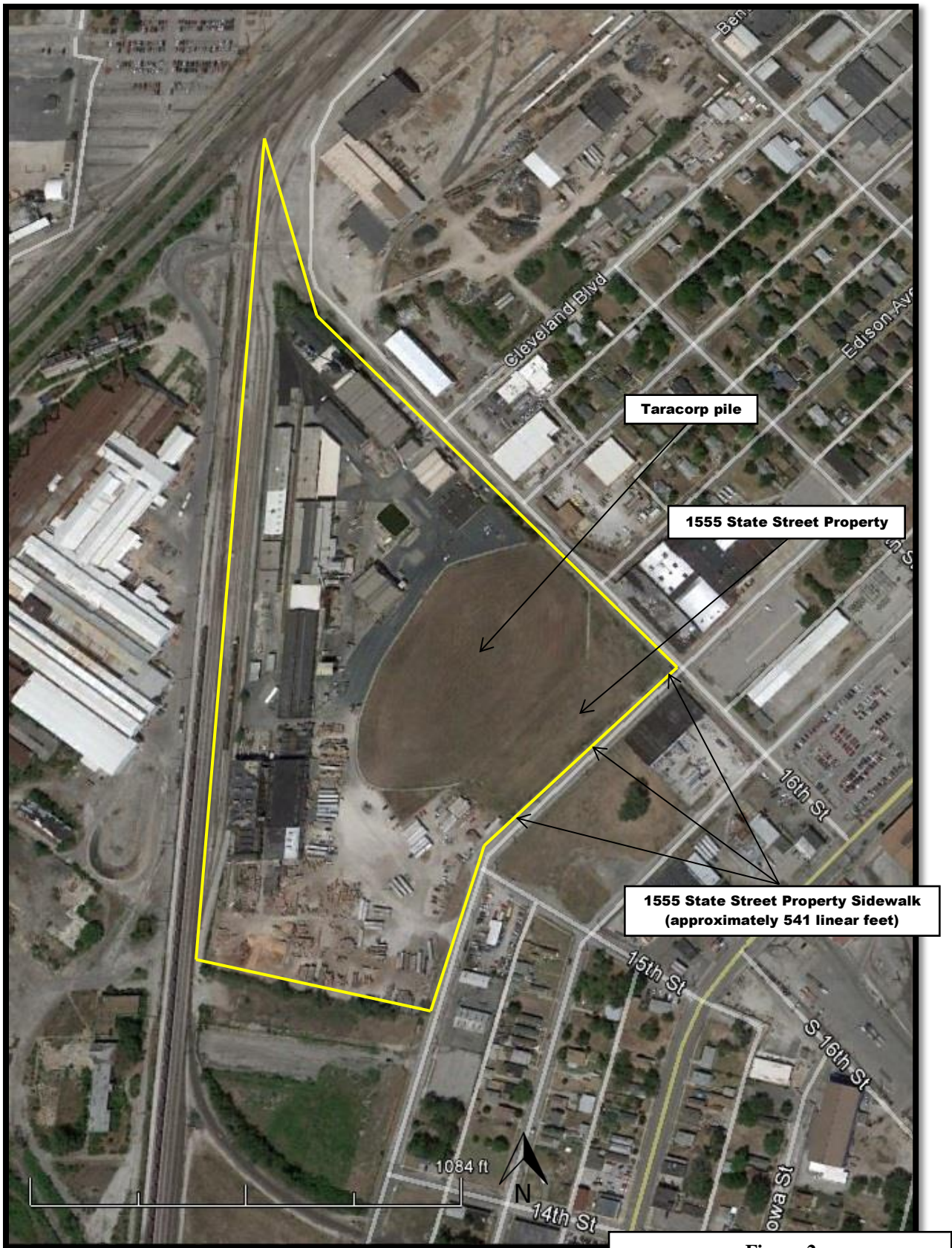


Figure 2
Main Industrial Site
(including 1555 State Street Property)

LIST OF APPENDICES

Appendix 1	Madison County Community Development Final Report, Lead-Based Paint Hazard Control
Appendix 2	EPA's August 16, 2004 and August 16, 2004 (revised) Letters Approving the SEP Work Plan and EPA's March 23, 2011 Letters Approving Section 8.0 and Section 9.0 of the Institutional Controls Work Plan
Appendix 3	EPA's May 8, 2000 News Release; Agenda for May 10, 2000 News Media Briefing; and Newspaper Articles
Appendix 4	MCCD's Final SEP Quarterly Report, March 2017
Appendix 5	Communications Regarding SEP Completion Date
Appendix 6	CD containing MCCD's: <ul style="list-style-type: none">▪ Risk Assessment Reports▪ Clearance Reports▪ Documentation Supporting MCCD's Expenditures to Implement the SEP
Appendix 7	SEP Soil Sampling and Abatement Results – Comparison to Remedial Action Data and Institutional Controls Activities
Appendix 8	Group's February 22, 2006 and November 3, 2006 Letters to EPA Regarding Requirements for "Appropriate Documentation of SEP Costs"
Appendix 9	Itemized SEP Expenditures (by Task) Spreadsheet
Appendix 10	Itemized SEP Expenditures (by Address) Spreadsheet
Appendix 11	Supporting Documentation for EWI's Expenditures